

Pacific Choice Seafood 1 Commercial St. Eureka, CA 95501

September 20, 2017

David Adams Source Control City of Eureka 1301 Hilfiker Ln. Eureka, CA 95503

RE: Notice of Violation/Corrective Action dated 9/19/2017

Dear Mr. Adams

As requested in the above referenced Notice of Violation, please accept our written response below:

We believe our team members did not do a dry clean up before washing down the floors in our fillet processing room. We also believe the drain baskets were pulled allowing the tags and gloves to go out to the lift station. Regarding the weekly report during shrimp processing operations, we have stopped producing shrimp as of 8/12/2017 for this season. Specific steps taken toward correcting the violations include:

- 1. General cleanup at the end of the production shift will be monitored by our shift supervisors. Heightened awareness has been implemented on dry clean up to prevent solids from going down the processing drains.
- Documented training will be completed by 9/22/2017 by all departments using the visual supplied by the Eureka Source Control Inspector.
- We will designate one person who will be responsible to submit required weekly reports during periods of shrimp processing for our 2018 shrimp season starting mid-April.
- 4. As stated previously, we are currently working with our corporate engineers and Brian Gerving, Director of Public Health for the City of Eureka, on diverting all plant production water to our waste water treatment plant, where we will be able to capture all foreign material before being released to the city.

Sincerely,

John King

General Manager



CITY OF EUREKA

PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202 Administration: 707-441-4203 • Engineering: 707-441-4194 Building: 707-441-4155 • Utility Operations: 707-441-4364

publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

September 19, 2017

Mr. John King Pacific Choice Scafood 1 Commercial Street Eureka, CA 95501



RE: NOTICE OF VIOLATION/CORRECTIVE ACTION

Dear Mr. King,

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50.

On August 18, 2017, a routine check and cleaning was performed of the Commercial Street lift station.) During this inspection, City of Eureka collection system crews identified and removed solid wastes not compatible with the sanitary sewer system. Some of these substances were identifying tags or labels that stated "undefined product" and disposable gloves. A follow-up inspection was performed to determine if these items may be originating at Pacific Choice Seafood. During the inspection, General Manager John King and staff showed Source Control personnel that the labels on their products did not match the labels present in the lift station at that time.

On September 12, 2017, another routine check and cleaning found more of the "undefined product" labels and gloves as well as label and identification tags that clearly identify as originating from Pacific Choice Seafood. This is a violation of the EMC and Wastewater Discharge Permit #37. (see enclosed photo)

A review of the conditions set forth in Wastewater Discharge Permit #37 determined that Pacific Choice Seafood has also failed to submit required weekly reports during periods of shrimp processing operations. This is also a violation of the EMC and Wastewater Discharge Permit #37.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Sincerely,

David Adams

Source Control Inspector

Encl: Notice of Violation; photo of Pacific Choice Seafood identification tags from lift station

Engineering

Construction Development

Transportation

Field Operations

Water Distribution
Wastewater Collection
Equipment Operations

Building

Construction Regulation
Code Enforcement

Utility Operations

Water and Wastewater Treatment
Stormwater
Pretreatment

PACIFIC CHOICE SEAFOOD NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

- The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted
 by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment
 program to control such discharges.
- 2) Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
- 3) Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
- 4) This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner: Solid waste greater than one inch in any dimension was improperly disposed of and/or bypassed pretreatment screening controls and entered the sanitary sewer. Required weekly reports from the shrimp processing logbook specified in Permit #37, Part 1, Section M, have not been received.

PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

- 1) It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
- 2) It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation and a written response to this Notice which at a minimum address the following points:
 - a. Identification of the route of entry of the incompatible solid materials into the sewer system and additional engineering measures the permittee shall implement to eliminate the possibility of solid wastes of the nature listed above bypassing the existing screens.
 - b. Status of the shrimp processing operations logbook and steps taken to comply with the reporting requirements specified in Wastewater Discharge Permit #37.
- 3) Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.

This notice is effective upon receipt by Pacific Choice Seafood.

Correspondence regarding this notice shall be sent to:

Source Control City of Eureka 4301 Hilfiker Ln. Eureka, CA 95503 sourcecontrol@ci.eureka.ca.gov





ED_006495_00002306-00005



Family Companies & Wholly Owned Subsidiaries

Pacific Alaska Shellfish, Inc.

Washington Crab Producers, Inc.

Pacific Coast Seafoods Company

Pacific Surlmi Co., Inc.

Pacific Shrimp Co.

Pacific Choice Sexfood Company

Pacific Oyster Co.

Pacific Smoking Co.

Pacific Sea Food Co.

Pacific Fresh Sea Food Company

Pacific Group Transport Co.

Pacific Seafood Group

Jake's Famous Crawfish & Seafood

Bandon Pacific

Live Seafoods Co.

DISTRIBUTION CENTERS

Seattle, Wa. Spokane, Wa. Clackamas, Ore. Portland, Ore. Medford, Ore. Sacramento, Calif. Fresno, Calif.

PRODUCTION FACILITIES

Kenal, Alaska Westporf, Wa. Warrenton, Ore. Bay City, Ore. Salem, Ore. Albany, Ore. Newport, Ore. Charleston, Ore. Bandon, Ore. Eureka, Calif.

RECEIVING STATIONS

Kenai, Alaska Blaine, Wa. Westport, Wa. Warrenton, Ore. Garibaldi, Ore. Newport, Ore. Charleston, Ore. Bendon, Ore. Brookings, Ore. Crescent City, Calif. Eureka, Calif. San Francisco, Calif.

BRANOS

Pacific Fresh
Pacific Smoking Co.
Snow Mist
Sea Rock
Jake's Famous.
Crawifish & Seafood
Newport Shrimp
Bandon Bay Fisheries
Bandon Fisheries
Bandon Gold
Ocean Fresh
S&S
Nemesis

PACIFIC CHOICE SEAFOODS CO.

1 COMMERCIAL ST. * EUREKA, CA 95501

Pacific Choice Seafood 1 Commercial St. Eureka, CA 95501

(707) 442-2981 * FAX (707) 442-2985

August 21, 2017

Clay Yerby City of Eureka Public Works Department 531 K Street Eureka, CA 95501

RE: Notice of Violation/Corrective Action dated 8/17/2017

Dear Mr. Yerby

As requested in the above referenced Notice of Violation, please accept our written response below:

We believe a team member on our Sanitation Team may have removed catch baskets and drain plugs before preforming dry cleanup of all material. This issue has been readdressed with our entire Sanitation Team. A signed copy of the training by all sanitation team members as well as the 2nd shift production manager is attached with this response. Specific steps taken toward correcting the violation include:

- All sanitation cleanings are monitored and documented. Heightened awareness has been implemented on dry clean up to prevent solids from going down the drains. In addition, sanitation personnel must receive verbal permission after inspection from their supervisor before pulling any plugs to the city sewer.
- 2. All shrimp waste outside the berm is squeegeed and shoveled into a tote and taken to our shell waste truck.
- 3. Training occurred with the sanitation teams on the evenings of 8/10/2017. Please find attached documentation of training with this response.
- Upon inspection of equipment on 8/10/2017, all baskets, and pumps were found to be operational and in good repair.
- 5. Since last shrimp season, we have modified and replaced all water flumes to better contain and flow shrimp shells to avoid contact with floor drains.
- 6. We are currently working with our corporate engineers and Brian Gerving, Director of Public Health for the City of Eureka, on diverting all plant production water to our waste water treatment plant.

Sincerely,

John King

General Manager

Pacific Seafood Processing Training Record

| Tr | aining D | ate: 8.10.17 Training Start T | in | e: <u>9:004~</u> End Time: | 9:10ph Total Duration: | <u> Chin</u> hrs | | |
|----------------------------------|---|--|-----------|--|--|---|--|--|
| Tr | Trainer Name: Andrew & Title/Affiliation: Supervisor Interpreter Name: N/A | | | | | | | |
| Sc | ope of T | raining (Trainer, please mark below as appropriate.) | | | | | | |
| | | lan – Training will focus on CCPs pertinent to employee's res') position(s) | | | I have attended the Pacific ession (with identified scor | | | |
| | | n – Section 1. Safety of Water | | | tand and do agree to comp | | | |
| | SSOP Plan | n – Section 2. Condition and Cleanliness of Food Contact | - | | measures of each program | I am train | | |
| | Surfaces | | | Confirmation of Ag | ************************************** | | | |
| ICI | SSOP Plan – Section 3. Prevention of Cross-Contamination | | | Print Name | Title / Position | Signatu | | |
| | SSOP Plan – Section 4. Maintenance of Hand Washing, Hand Sanitizing, and Toilet Facilities | | | Andrew Perin | al Supeniur | Anfras | | |
| O; | SSOP Plan – Section S. Protection of Food and Food-Contacting Material from Adulterants | | | Dowbellon | , les | 9377 | | |
| | | Staple Use SOP | | 1000 | a Smalled in | Wast. | | |
| | | Control Program; Glass Brittle Hard Plastic Policy | | Mike Gang 66 | K Daritation | 1662 | | |
| | SSOP Plan Compour | a – Section 6. Labeling, Storage, and Use of Toxic ds | \dagger | JAREADO HIL | 1 Savitation | 14 | | |
| | | n – Section 7. Control of Employee Health Conditions that naminate Food | | Mooffe, Bolom | Socitation | | | |
| | | Medicine Use Policy and Medical Screening Policy | * | Conothy Culpi | 12 Sanitation | 17:1/ | | |
| Ω | | 1 – Section 8. Exclusion of Pests | | ************************************* | | 7/2 | | |
| | | - Section 9. Prevention of Allergen Contamination | | Christ Whie | J Saritation | CA | | |
| | | spill or notice of contamination controls | | 1 01. | 1 1 | 7 | | |
| Jan 1 | | anitation Instructions and Schedule Program | | Den Barros | on Sour tation | Name of | | |
| | <u> </u> | Sanitation Schedule | | Melther Goldo | n Sovitation | -2 | | |
| | | Sanitation Chemical Properties; MSDS | | 1822422100124 | 7 J J J J J J J J J J J J J J J J J J J | | | |
| | <u>r</u> | Key Procedures for Sanitizing Processing Equipment Specific Equipment and Area cleaning and sanitation Instructions | | TRAVIS TEA | PM. SUPERVISOR | 2 Agr | | |
| 0 | Dradurt (| Quality Program | | DONLA AllEN | Sanitation | Newh | | |
| 1 | | Product Specification | | | . 3 . 5 | 1/2-1 | | |
| | 13 | Product and Processing Quality Check procedures | | <u> Zapren nom</u> | < Swithhion | 4-24 | | |
| | Crises Ma | inagement | | Troy McClusk | er Sanitation | | | |
| | | Business Continuity Plan – relevant sections on crew. responsibilities | | | +1 Sanitation | 1797 | | |
| | O | Food Defense Program – relevant sections on crew responsibilities | | Janes In | | | | |
| | Micro Te | sting Program | | 70050000000000000000000000000000000000 | | _ | | |
| | | Environmental Sampling (Micro and/or ATP) | | | | | | |
| | Identity P | reserved Material Controls (MSC certification) | | | | , | | |
| | ci | Receiving Contrals | | ************************************** | | | | |
| | | Processing Controls | | | | | | |
| | | tation Control | | | ······································ | ····· | | |
| | | ty and Recall Programs | | | | | | |
| | • | tation Controls | | *************************************** | *************************************** | | | |
| | | Inbound and Outbound transportation controls | | ************************************** | | | | |
| p-s | U Višitara S | Notice to Drivers | | | | | | |
| | | ood Safety and Plant Security Agreement nce Program Sanitation Controls | | | | | | |
| 0 | | nce Program Sanitation Controls t Handling Procedures | | | | | | |
| | | t nandling Procedures Material Check Program | | ************************************** | ************************************** | | | |
| | | ns within the Master Calibration Program | - | | | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | |
| 10/ | | | | | | | | |
| Other Define: Refering on Irains | | | | | | | | |
| G/ | id n | of renowing drain plags reacts. y-Customized for Pacific Choice Seafoods, 1 Continercial St | | | | | | |
| Tra | ining Polic | y – Customized for Pacific Choice Seafoods, 1 Continercial St | ī., ŧ | Gureka, CA | Page 5 of 5 | | | |

Trainee Statement: I have attended the Pacific Seafood Processing training session (with identified scope on left column) and I do fully understand and do agree to comply with and perform all required measures of each program I am trained on.

| | Confirmation of Agreement | | | | | | |
|---|--|---|---|--|--|--|--|
| *************************************** | Print Name | Title / Position | Signature | | | | |
| | Andrew Period | Supervisor | and I have the second | | | | |
| *************************************** | Dazabethone | . 1 | 974 | | | | |
| - | Mike Gang bec | Saritution | 15. 1. 26/ | | | | |
| - | Jueros VIII | Sarifation | 2000 | | | | |
| - | Moffler Bhil | Sovitation | William TH | | | | |
| 4 | Constly Culprice | Saritation | Wari | | | | |
| ************* | Chirly Wes | Sanitation | CHILL | | | | |
| - | Son Varision | Sovitation. | In Au | | | | |
| | Melter Goldon | Soulfation | | | | | |
| - | TRAVIS TEA | Pm. SUPERVISOR | dais L | | | | |
| - | JONLA AllEN | Sanifation | whate | | | | |
| | Frates Jans | Swithhin o | | | | | |
| - | Troy McCluskey | | L'MEL | | | | |
| A CONTRACTOR | Chrim Snith | Suritation | 1955 | | | | |
| | J | | | | | | |
| *************************************** | | | | | | | |
| | | | · | | | | |
| gestations | | | | | | | |
| *************************************** | 04_00_00000000000000000000000000000000 | ysseccessoccoccoccoccoccoccoccoccoccoccoccoccoc | 000000000000000000000000000000000000000 | | | | |
| - decement | , , , , , , , , , , , , , , , , , , , | | | | | | |
| - | | | *************************************** | | | | |
| - | | | 00000000000000000000000000000000000000 | | | | |
| ووومسسوك | | | *************************************** | | | | |
| *************************************** | entrology | | 00000000000000000000000000000000000000 | | | | |



PRETREATMENT FACILITY INSPECTION REPORT

| GENERAL INFORMATION | | | | | | |
|---|--|--|--|--|--|--|
| Business Name: Pacific Quoice | | | | | | |
| Address: # 1 COMMENCIAL St. Same time both day | | | | | | |
| Date: 8-10-17 /8-11-17 11110 1111 2:30 11110 001. 3430 | | | | | | |
| Persons Present During Inspection: Durid Adams/Clay Ywby Source Control Name: Title: | | | | | | |
| Name: Tohn Winey Title: General Manager Industry Contact Name: Title: | | | | | | |
| Industry Contact Name: | | | | | | |
| Inspection Type: (A) Scheduled (B) Unscheduled (C) Emergency (D) Pretreatment Division Monitoring (E) Self-Monitoring | | | | | | |
| INSPECTION SUMMARY | | | | | | |
| Purpose: Visual and verbal inspection of shrimp | | | | | | |
| processing system. Collections crew recently had | | | | | | |
| to un-cloq lift station adjacent to Pacific Choice. | | | | | | |
| Cloq was defermined to be caused by excess | | | | | | |
| stiring shells and debvis from processing. | | | | | | |
| 3 | | | | | | |
| Findings: Sanifation crew possibly removing plugs | | | | | | |
| In floor deaths during Clean-up. System and | | | | | | |
| area was clean and orderly as no processing | | | | | | |
| carrently being performed, Will return 8-11-17 | | | | | | |
| to witness processing. Withmately a Notice of Violenting | | | | | | |
| will be issued. | | | | | | |
| 8/11/17: Toured pacessing of Shring and fish. Staff was | | | | | | |
| Proceeds and therewall the recognition and their as in the | | | | | | |
| us answering a vestions. Source Control is appreciative. | | | | | | |
| 8/11/17: Toured processing of Shring and fish. Staff was engaging and thorough in presenting process as well as answering questions. Source Control is appreciative. SIGNATURES. | | | | | | |
| Inspector: Industry Contact: | | | | | | |
| | | | | | | |



CITY OF EUREKA

PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202

Administration: 707-441-4203 • Engineering: 707-441-4194

Building: 707-441-4155 • Utility Operations: 707-441-4364

publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

August 17, 2017

Mr. John King Pacific Choice Seafood I. Commercial Street Eureka, CA 95501

RE: NOTICE OF VIOLATION/CORRECTIVE ACTION

Dear Mr. King,

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50.

On July 19, 2017 and again on August 8, 2017, City of Eureka collection system crews responded to high wetwell level alarms at the Commercial Street Lift Station. In both instances the alarms were the result of shrimp shells causing a blockage in the lift station pumping system.

During Source Control inspections on August 10, 2017 and August 11, 2017 inspectors were shown the area where shrimp are cooked, and shelled. This is where most of the shrimp waste is generated. General Manager John King, explained that the sanitation night crew might be removing the screens on floor drains within the bermed shrimp cooking/shelling area during cleaning, and therefore shrimp waste is discharged to the sanitary sewer. Inspectors also noticed that there was significant shrimp waste outside the bermed area. This is a violation of the EMC. In the future if City crews are required to respond to collection system malfunctions caused by the discharge from Pacific Choice Seafood, the City of Eureka will bill Pacific Choice Seafood for all costs it incurs to correct the malfunction.

On October 31, 2016, Pacific Choice Seafood was issued a Notice of Violation resulting from excessive amounts of shrimp shells entering its treatment plant headworks and impacting the plants screening system. In response, Pacific Choice Seafood listed four actions it would take in order to correct the excessive shrimp waste discharges. It's apparent that the listed programmatic measures did not correct the problem.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4362 if you have any questions or concerns regarding the Notice.

Source Control Supervisor

Cc:

Michael Hansen, Deputy Director of Public Works, Utilities Operations

Engineering Construction

Development Transportation Field Operations
Water Distribution

Wastewater Collection Equipment Operations Building

Construction Regulation Code Enforcement



Utility Operations

Water and Wastewater Treatment
Stormwater
Pretreatment

PACIFIC CHOICE SEAFOOD NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

- 1) The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment program to control such discharges.
- 2) Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
- Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
- 4) This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner: Shrimp waste was inadequately disposed of in the Pacific Choice waste piping system and as a result was discharged into the sanitary sewer system which blocked the City's Commercial Street lift station.

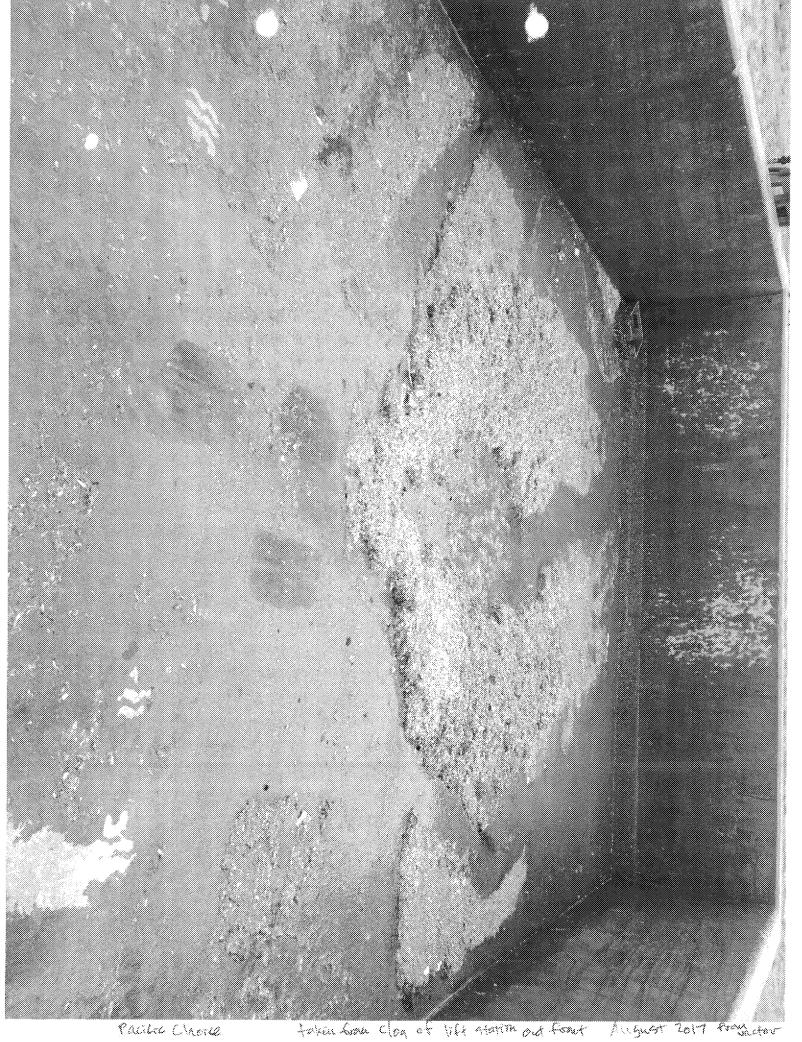
PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

- It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
- 2) It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation and a written response to this Notice which at a minimum address the following points:
 - a. Additional engineering measures the permittee shall implement to eliminate the possibility of bypassing the existing screens.
 - b. Additional engineering measures to capture seafood waste solids from the waste discharge drains outside the shrimp shelling/cooking bermed area.
- 3) Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.

This notice is effective upon receipt by Pacific Choice Seafood.

Correspondence regarding this notice shall be sent to:

Source Control City of Eureka 4301 Hilfiker Ln. Eureka, CA 95503



ED_006495_00002306-00011



FAMILY COMPANIES & WHOLLY OWNED SUBSIDIARIES

Pacific Alaska Shellfish, Inc.

Washington Crab Producers, Inc.

Pacific Coast Seafoods Company

Pacific Strimi Co., Inc.

Pacific Shrimp-Co.

Pacific Choice Seafood Company

Pacific Oyster Co.

Pacific Smoking Co.

Pacific Sea Food Co.

Pacific Fresh Sea Food Company

Pacific Group Transport Co.

Pacific Sealood Group

Jake's Famous Crawfish & Seafood

Bandon Pacific

Live Seafoods Co.

DISTRIBUTION CENTERS

Seatile, Wa. Spokane, Wa. Clackamas, Ore. Portland, Ore. Medford, Ore. Sacramento, Calif. Fresno, Calif.

PRODUCTION FACILITIES

Kenai, Alaska Westport, Wa. Warrenton, Ore. Bay City, Ore. Salem, Ore. Albany, Ore. Newport, Ore. Charleston, Ore. Bandon, Ore. Eureka, Calif.

RECEIVING STATIONS

Kenai, Alaska Blaine, Wa. Westport, Wa. Warrenton, Ore. Garibaldi, Ore. Newport, Ore. Charleston, Ore. Bandon, Ore. Brookings, Ore. Crescem City, Calif. Eureka, Calif. San Francisco, Calif.

8RAND\$

Pacific Fresh
Pacific Snokking Co.
Snow Mist
Sea Rock
Jake's Famous
Crawfish & Seafood
Newport Shrimp
Bandon Bay Fisheries
Bandon Fisheries
Bandon Fisheries
Bandon Fisheries
Bandon Fresh
S&S
Nemesis

PACIFIC CHOICE SEAFOODS CO.

1 COMMERCIAL ST. • EUREKA, CA 95501 (707) 442-2981 • FAX (707) 442-2985

Pacific Choice Seafood 1 Commercial St. Eureka, CA 95501

November 4, 2016

Roxana Vargas City of Eureka 4301 Hilfiker Lane Eureka, CA 95503

RE: Notice of Violation/Corrective Action dated 10/31/2016

Dear Ms. Vargas:

As requested in the above referenced Notice of Violation, please accept our written response below:

We believe a new team member on our Sanitation Team may have been removing catch baskets from the drains before preforming dry cleanup of all material. This issue has been addressed with said team member, as well as the entire Sanitation Team, to ensure the violation is not repeated in the future. Specific steps taken toward correcting the violation include:

- 1. All sanitation cleanings are monitored and documented. Heightened awareness has been implemented on dry clean up to prevent solids from going down the drains.
- Training occurred with the sanitation teams on the evenings of 10/31/2016 and 11/1/2016. Please find attached documentation of training with this response.
- Upon inspection of equipment on 10/31/2016, all baskets, sieves, and pumps were found to be operational and in good repair.
- Additionally, we will be modifying all water flumes to better contain and flow shrimp shells to avoid contact with floor drains.

Please let me know if there are any questions,

John King

General Manager

Pacific Seafood Processing Training Record

| Tra | aining Da | ite: 11/01/16 Training Start Tir | me: <u>[ට 30</u> p_End Time: ↓〔 | <u>∑</u> | <u> </u> | | |
|---|---|---|--|---|--|--|--|
| Trainer Name: Andrew Period Title/Affiliation: Spenisor Interpreter Name: | | | | | | | |
| Sco | ope of Tr | aining (Trainer, please mark below as appropriate.) | | ت عسر بدا به با ش | . | | |
| D | HACCP Plan - Training will focus on CCPs pertinent to employee's (employees') position(s) SSOP Plan - Section 1. Safety of Water SSOP Plan - Section 2. Condition and Cleanliness of Food Contact | | Trainee Statement: I have attended the Pacific Seafood Processing training session (with identified scope on left column) and I do fully understand and do agree to comply with and perform all required measures of each program I am trained on. | | | | |
| | Surfaces | - Section 3. Prevention of Cross-Contamination | Confirmation of Agree | garrasarrasarrasarrasarrasarrasarrasarr | C. and the same of | | |
|)) | SSOP Plan | - Section 4. Maintenance of Hand Washing, Hand and Toilet Facilities | Adrew Richal | Title / Position ろりゃいさっこ | Signature) | | |
| 3 | | -Section 5. Protection of Food and Food-Contacting rom Adulterants | Award, Exdon | Shinkzeton | | | |
| | | Staple Use SOP | Jacon 216 | St. A. L. L. | Company of the Compan | | |
| 3 | | Control Program; Glass Brittle Hard Plastic Policy — Section 6. Labeling, Storage, and Use of Toxic | Nick ausen | 545;4/22/25 5/22\20\20\20\ | N/A. | | |
| ב. ב | SSOP Plan | -Section 7. Control of Employee Health Conditions that taminate Food | Werthese | Sunitairm | | | |
| 3 | | Medicine Use Policy and Medical Screening Policy - Section 8. Exclusion of Pests | Mysia Casa | Leed LSanifetias | Maile | | |
|] | SSOP Plan | - Section 9. Prevention of Allergen Contamination | Mathan Burel | Sonzfallon | 1144565 | | |
| 2) | | pill or notice of contamination controls | | | | | |
| 2 | Master Sa | nitation Instructions and Schedule Program | | | | | |
| | D | Sanitation Schedule | | | | | |
| | 0 | Sanitation Chemical Properties; MSD5 | | | ••••••••••••••••••••••••••••••••••••••• | | |
| | 0 | Key Procedures for Sanitizing Processing Equipment Specific Equipment and Area cleaning and sanitation Instructions | | | | | |
| 3 | Product O | uality Program | | | | | |
| | 0 | Product Specification | | | | | |
| | | Product and Processing Quality Check procedures | *************************************** | *************************************** | *************************************** | | |
| 3 | Crises Ma | nagement | | | | | |
| | Q | Business Continuity Plan – relevant sections on crew responsibilities | | | | | |
| | | Food Defense Program – relevant sections on crew responsibilities | 4 | 5 | | | |
| | Micro Tes | ting Program | | | | | |
| | 0 | Environmental Sampling (Micro and/or ATP) | | | | | |
| | | reserved Material Controls (MSC certification) | | | | | |
| | | Receiving Controls | *************************************** | · | | | |
| mi z | D Name | Processing Controls | | | | | |
| | | tation Control ty and Recall Programs | | \$0000000000000000000000000000000000000 | | | |
| ق ق | | ation Controls | | | | | |
| 223 | G | Inbound and Outbound transportation controls | | | | | |
| ــــــــــــــــــــــــــــــــــــــ | O | Notice to Drivers | | | | | |
| | Visitors Food Safety and Plant Security Agreement | | | | | | |
|) - | Maintenance Program Sanitation Controls | | No. | : | | | |
| Д П | Complaint Handling Procedures Incoming Material Check Program | | *************************************** | | | | |
| D. | | | | | | | |
| o b/_ | A 1 1 | | | | | | |
| ď | | tine: Dogin draning | | 3. | Anna ann ann ann ann ann ann ann ann ann | | |
| مختورتسان ريكان ^{وي} ود | Ining Dalis | | 1 | | make a lite | | |

1 Commercial Street, Eureka, CA 95501 Pacific Seafood Processing Training Record

| Tr | aining Da | ite: 10346 Training Start T | lme: | Zan End Time: 12 | いっぱい Duration: <u>ィフ</u> | <u>5</u> hrs | | |
|------------------------------------|--|---|--------------------|---|--|---|--|--|
| Tr | ainer Na | me: <u>And New Restrict</u> title/Affiliation: <u>Sy</u> | leo | Interpreto | er Name: <u>N/A</u> | annina na antiquique | | |
| Sc | ope of Ti | aining (Trainer, please mark below as appropriate.) | | | | | | |
| | HACCP Plan – Training will focus on CCPs pertinent to employee's (employees') position(s) | | | Trainee Statement: I have attended the Pacific Seafood Processing training session (with identified scope on left column) | | | | |
| O | 5SOP Plan | - Section 1. Safety of Water | | and I do fully understand and do agree to comply with and | | | | |
| 1 | | | | perform all required measures of each program I am trained on. | | | | |
| سنريه | Surfaces | | | Confirmation of Agreen | | regonacción de la company | | |
| 4 | SSOP Plan – Section 3. Prevention of Cross-Contamination | | | Print Name | Title / Position | Signature / | | |
| D. | SSOP Plan – Section 4. Maintenance of Hand Washing, Hand Sanitizing, and Toilet Facilities | | | William HVIII ans | Sonitation | | | |
| | SSOP Plan – Section 5: Protection of Food and Food-Contacting Material from Adulterants | | | MORLENSE | Sanderlan | mis curd | | |
| | О | Staple Use SOP | | Annoviche Bredart | Santation | LAJ 22-/ | | |
| | SSOP Plan | ontrol Program; Glass Brittle Hard Plastic Policy — Section 6. Labeling, Storage, and Use of Toxic | | 1/_11 | Santation | | | |
| Ò | | - Section 7. Control of Employee Health Conditions that | | DAVACNATUE | Contitue. | | | |
| | | taminate Food | | | tit täädeskileidadalainadaditeeskii fi muumaana. 21 | | | |
| a | | Medicine Use Policy and Medical Screening Policy Section 8. Exclusion of Pests | | MANU CONN | Sanket was Sur | | | |
| G: | | - Section 9. Prevention of Allergen Contamination | | | , | | | |
| | | pill or notice of contamination controls | | ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ | *************************************** | ļ | | |
| Ω | | nitation instructions and Schedule Program | | | | / | | |
| | | Sanitation Schedule | | ************************************** | *************************************** | *************************************** | | |
| | c | Sanitation Chemical Properties; MSDS | | | | | | |
| | О | Key Procedures for Sanitizing Processing Equipment | | | | | | |
| | ជ | Specific Equipment and Area cleaning and sanitation instructions | | | ······································ | | | |
| | Product C | uality Program | | ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ | 00000000000000000000000000000000000000 | | | |
| | ₽ | Product Specification | | | | | | |
| | | Product and Processing Quality Check procedures | | 90000000000000000000000000000000000000 | | | | |
| 0: | Crises Ma | nagement | | | | | | |
| | Ö | Business Continuity Plan — relevant sections on crew responsibilities | | | | | | |
| | Ø | Food Defense Program – relevant sections on crew responsibilities | | | | | | |
| U | | sting Program | | | | | | |
| | | Environmental Sampling (Micro and/or ATP) | | *************************************** | ************************************** | | | |
| | | reserved Material Controls (MSC certification) | | : | | | | |
| | 0 | Receiving Controls Processing Controls | | | constants, 2000, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 1900, 190 | | | |
| m | D | rrocessing controls tation Control | | | | | | |
| | | ty and Recall Programs | | | | | | |
| U | | ation Controls | | | | | | |
| **** | | Inhound and Outbound Transportation controls | | | | | | |
| | 0 | Notice to Drivers | | ************************************** | ************************************** | | | |
| O | Visitors Fo | ood Safety and Plant Security Agreement | | | | | | |
| O | | nce Program Sanitation Controls | | *************************************** | ************************************** | | | |
| П | | Handling Procedures | | | *************************************** | | | |
| О | | Material Check Program | | | *** | a constant | | |
| | Instructio | ns within the Master Calibration Program | | | | | | |
| Work Instructions, on Viala Chapma | | | | · | | | | |
| ď | Other: De | ructions, on Dtala Graning Time: Time sheets and Times Wilk | TERROR PERFORMANCE | • | | >>>50 | | |
| | | | _d | | | | | |



CITY OF EUREKA

PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146 • Fax 707-441-4202 Administration: 707-441-4203 • Engineering: 707-441-4194 Building: 707-441-4155 • Utility Operations: 707-441-4364 publicworks@ci.eureka.ca.gov • www.ci.eureka.ca.gov

October 31, 2016

Pacific Choice Seafood 1 Commercial Street Eureka, CA 95501

Dear Mr. John King,

RE: NOTICE OF VILATION/CORRECTIVE ACTION

Enclosed is a Notice of Violation regarding Wastewater Discharge Permit #37. Please be advised that to avoid administrative penalties, Pacific Choice Seafood must fully comply with all terms stated in this Notice. Administrative, civil, and criminal penalties for violations of pretreatment standards and requirements are described in the Eureka Municipal Code (EMC), Title 5, Chapter 50.

The City of Eureka has been noticing considerable amounts of shrimp waste in our headworks. The screening process of our effluent is trapping large amounts of shrimp shells from the recent discharges of shrimp wastewater from Pacific Choice Seafood. During my inspection on October 31, 2016, I was shown the shrimp process/steam area where rollers remove the shell and head of shrimp, where most of the shrimp waste is generated. General Manager John King, explained to me that the sanitation night crew might be removing the baskets on the sanitary floor drains in that area during cleaning, and therefore shrimp waste may be discharging into the sanitary sewer. This is a violation of section 50.020 of the EMC, which states that no person shall introduce or cause to be introduced into the POTW, directly or indirectly, any pollutant or wastewater which causes pass through or interference.

Pacific Choice shall submit to this office by 11/7/2016, a written response to this Notice which at a minimum addresses the following points:

- 1. The permittee shall attentively monitor and log all sanitation cleanings in the facility to verify all proper maintenance procedures are being performed.
- 2. The permittee shall implement a training system that incorporates acceptable sanitation methods and disposal of seafood waste. Records or logs of training sessions shall be documented.
- 3. At the permittee's expense, the permittee shall also replace defective baskets and screens on all the floor drains, to prevent accidental discharges of seafood waste into the sanitary sewer.

Your cooperation in resolving this matter is greatly appreciated. Please contact me at (707) 441-4011 if you have any questions or concerns regarding the Notice.

Sincerely.

Roxana Vargas

Source Control Inspector

Engineering

Construction Development Transportation Field Operations
Water Distribution

Wastewater Collection
Equipment Operations

Building

Construction Regulation Code Enforcement Utility Operations

Water and Wastewater Treatment Stormwater Pretreatment

PACIFIC CHOICE SEAFOOD NOTICE OF VIOLATION

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the City of Eureka City Manager under the City of Eureka Municipal Code (EMC) Title 5, Chapter 50, Sewers. This Order is based on findings of violation of the conditions of the Wastewater Discharge Permit issued under Section 50.051 of the City's Municipal Code.

FINDINGS

- 1. The City of Eureka owns and operates a Publicly Owned Treatment Works which could be adversely impacted by discharges from Pacific Choice Seafood and other industrial users, and has implemented a pretreatment program to control such discharges.
- 2. Under this pretreatment program Pacific Choice Seafood was issued Wastewater Discharge Permit Number 37 on October 3, 2014 that contains prohibitions, restrictions, limitations and self-monitoring requirements related to the discharge of wastewater to the sanitary sewer.
- 3. Pursuant to the EMC and the above-referenced permit, data on the compliance status of Pacific Choice Seafood is collected by the City of Eureka.
- 4. This data shows that Pacific Choice Seafood has violated EMC Section 50.020(B), 50.055 and Wastewater Discharge Permit Number 37 in the following manner:
 - A. Shrimp waste was inadequately disposed of in the shrimp process area, and as a result was discharged into the sanitary sewer system.

PACIFIC CHOICE SEAFOOD IS HEREBY NOTIFIED THAT:

- 1. It is in violation of Wastewater Discharge Permit Number 37 and the Sewer Use Ordinance of the City of Eureka.
- 2. It is required to **notify this office in writing** within seven (7) working days of receipt of this Notice of the reason for the wastewater discharge violation, the action to be taken to correct the non-compliance violation, and the date the corrective action has been or will be implemented.
- 3. It is required to contact the City of Eureka within seven (7) working days of the corrective action implemented for item 4. A. (above) of the requirements outlined in the notification letter attached to this Notice.
- 4. Failure to respond within the time frames indicated will constitute a further violation of the Sewer Use Ordinance and may subject Pacific Choice Seafood to administrative fines in the amount of one thousand dollars (\$1000) per day per violation in accordance with section 50.123 (F) of the EMC.
- 5. This notice is effective upon receipt by Pacific Choice Seafood.
- 6. Correspondence regarding this notice shall be sent to:

Roxana Vargas Source Control Inspector City of Eureka 4301 Hilfiker Ln. Eureka, CA 95503